

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13

Danette Moody : Bankruptcy No. 18-10712AMC  
(DEBTOR)

**MOTION FOR CONTINUANCE OF THE STAY  
BEYOND 30 DAY PERIOD UNDER 11 U.S.C. §362**

1. Debtor has had the following prior cases;

Ch 13 11-15774BIF  
Filed 7-22-11  
Confirmed 4-10-12  
Dismissed 10-29-13  
Attorney Cibik & Cataldo, PC

Ch 13 13-19485AMC  
Filed 10-31-13  
Confirmed 7-15-14  
Dismissed 8-23-16  
Attorney Cibik & Cataldo, PC

Ch 13 16-16189AMC  
Filed 9-2-16  
Confirmed 6-27-17  
Dismissed 12-19-17  
Attorney Cibik & Cataldo, PC

2. Only the most recent case was dismissed within the prior 12 months.
3. There are no bar orders or consent order governing refiling.
4. Debtor's issues are health related. She had a heart condition which culminated in heart surgery which kept her out of work from October 2017 through dismissal of her last case.
5. Dismissal was caused by trustee arrears caused by her health issues and missed work.
6. Debtor has completed her rehabilitation allowing her to return to work and able to work more hours than previously allowed by her health.
7. With her return to work, Debtor is applying for a wage order.
8. Debtor is agreeable to an order requiring leave of court for any refiling.
9. Debtor resides in the collateral real estate and desires to keep her home.
10. Debtor's plan of \$800 per month for 60 months is feasible.

11. Debtor has equity in her residence
12. Debtor has a personal injury claim with now exempt proceeds to be paid d for the benefit of general unsecured creditors.
13. Debtor is paying City of Philadelphia obligations and a car through the plan with direct pay to the SBA with pro rata distribution to general unsecured.

WHEREFORE, Debtor prays that this Honorable Court enter an order extending the 30-day automatic stay.

Respectfully submitted,

Date: **February 2, 2018**

BY: /s/ Michael A. Cataldo  
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